

**Hearing Date: October 24, 2023 at 9:00 a.m.**  
**Objection Deadline: October 16, 2023 at 4:00 p.m.**

**VENABLE LLP**

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*Counsel to Ignat Tuganov*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
CELSIUS NETWORK LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 22-10964 (MG)
	:	Jointly Administered
Debtors.	:	
	:	
	X	

**NOTICE OF APPLICATION OF IGNAT TUGANOV FOR ENTRY OF AN ORDER,  
PURSUANT TO 11 U.S.C. §§ 503(b)(3)(D) AND 503(b)(4),  
FOR ALLOWANCE AND REIMBURSEMENT OF REASONABLE  
PROFESSIONAL FEES AND ACTUAL, NECESSARY EXPENSES  
IN MAKING A SUBSTANTIAL CONTRIBUTION TO THESE CASES**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 USA LLC (9450); GK8 Ltd. (1209); and GK8 UK Limited (0893). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

**PLEASE TAKE NOTICE** that, pursuant to the *Notice of Further Revised Schedule For Substantial Contribution Applications*, dated September 19, 2023 [Dkt. No. 3498] (the “Substantial Contribution Notice”), Ignat Tuganov, a creditor of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) and a party to the Debtors’ Plan Support Agreement, dated as of September 20, 2023, files his *Application For Entry of an Order, Pursuant to Sections 503(b)(3)(D) and 503(b)(4) of Title 11 of the United States Code, For Allowance and Reimbursement of Reasonable Professional Fees and Actual Necessary Expenses in Making a Substantial Contribution to These Cases* (the “Tuganov Application”).

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the revised schedule set forth in the Substantial Contribution Notice, a hearing will be held before the Honorable Martin Glenn, Chief United States Bankruptcy Judge for the Southern District of New York, One Bowling Green, New York, New York 10004 on October 24, 2023 at 9:00 a.m. (prevailing Eastern Time) and may be continued from time to time by the Court or the Debtors without further notice other than by such adjournment being announced in open court, by agenda filed with the Court, and/or by a Notice of Adjournment file with the Court and served on all parties entitled to notice.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application must be made in writing, stating in detail the reasons therefore, and must be filed with the Clerk of the Bankruptcy Court, with paper copies delivered to Chambers, and served upon: (i) Venable LLP, counsel to Ignat Tuganov, 151 West 42<sup>nd</sup> St., New York, New York 10036, Attn: Jeffrey S. Sabin Esq. (jssabin@venable.com) and 600 Massachusetts Avenue, NW, Washington, DC 20001 Attn: Andrew J. Currie, Esq. (ajcurrie@venable.com); (ii) the Office of the United States Trustee for the Southern District of New York (Region 2), U.S. Federal Office Building, 201 Varick

Street, Suite 1006, New York, New York 10014, Attn: Shara Cornell, Esq.

([Shara.Cornell@usdoj.gov](mailto:Shara.Cornell@usdoj.gov)); (iii) Kirkland & Ellis LLP, counsel to the Debtors and Debtors in Possession, 601 Lexington Avenue, New York, New York 10022, Attn: Joshua A. Sussberg, P.C. ([joshua.sussberg@kirkland.com](mailto:joshua.sussberg@kirkland.com)), Kirkland & Ellis LLP, counsel to the Debtors and Debtors in Possession, 300 North LaSalle Street, Chicago, Illinois 60654, Attn: Patrick J. Nash, Jr., P.C., Ross M. Kwasteniet, P.C., Christopher S. Koenig, Esq., Dan Latona, Esq.

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[david.turetsky@whitecase.com](mailto:david.turetsky@whitecase.com), [sam.hershey@whitecase.com](mailto:sam.hershey@whitecase.com), [jweedman@whitecase.com](mailto:jweedman@whitecase.com)),

White & Case LLP, Counsel to the Official Committee of Unsecured Creditors, 111 South Wacker Drive, Suite 5100, Chicago, Illinois 60606, Attn: Michael C. Andolina, Esq., and Gregory F. Pesce, Esq., ([m.andolina@whitecase.com](mailto:m.andolina@whitecase.com), [gregory.pesce@whitecase.com](mailto:gregory.pesce@whitecase.com)), White & Case LLP, Counsel to the Official Committee of Unsecured Creditors, Southeast Financial Center, 200 South Biscayne Blvd., Suite 4900, Miami, Florida 33131, Attn: Keith H. Wofford, Esq. ([kwofford@whitecase.com](mailto:kwofford@whitecase.com)), White & Case LLP, Counsel to the Official Committee of Unsecured Creditors, 555 South Flower Street, Suite 2700, Los Angeles, California 90071, Attn: Aaron E. Colodny, Esq. ([aaron.colodny@whitecase.com](mailto:aaron.colodny@whitecase.com)); and (v) any parties required to be

served under any applicable Bankruptcy Rule or Local Rule, so that they are actually received by the aforementioned parties not later than **4:00 p.m. (prevailing Eastern Time) on October 16, 2023** (the “Objection Deadline”). Objections not timely served and filed may not be considered by

the Court. If no objections are received prior to the Objection Deadline, the Court may cancel the Hearing and enter the proposed order attached to the Application without holding the Hearing.

Dated: New York, New York  
October 2, 2023

VENABLE LLP

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